UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 15 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hans Rutzen
Operations Director
Buckeye Caribbean Terminals LLC
P.O. Box 186
Yabucoa, Puerto Rico 00767

Re: Notice of Completeness and Request for Additional Information, NPDES Permit Application No. PR0000400

Dear Mr. Rutzen:

This notice is being sent in accordance with 40 Code of Federal Regulations (CFR) §124.3 to inform you that the application for a National Pollutant Discharge Elimination System (NPDES) permit for Outfalls 001 and 002 submitted under cover letter dated September 20, 2012 with revised application pages/documents (Attachment list and Attachments 1, 2, 4, 5, 6, 8, 9 and 10) submitted under June 19, 2013 cover letter for the following facility has been reviewed for completeness and is complete.

NPDES Permit No.	Facility Name
PR0000400	Buckeye Caribbean Terminals LLC

This notice is also being sent in accordance with 40 CFR §124.3 to inform you that the U.S. Environmental Protection Agency (EPA) has found that **additional information is necessary** to supplement the submitted application for the NPDES permit for the above facility. I am requesting that you submit the information indicated in the enclosure no later than thirty (30) days from the date of receipt of this letter. The EPA is authorized to request additional information from you to clarify, modify or supplement previously submitted material in processing your permit application. This request will not render your application incomplete.

If you have any questions in this matter, please contact Edward Schlueter of the NPDES Section at (212) 637 3834.

Sincerely yours,

Kate Anderson, Chief
Clean Water Regulatory Branch

Enclosure

cc: Ms. Annette Feliberty Ruiz, Chief
Point Sources Permits Division, Puerto Rico Environmental Quality Board (with enclosure)

Enclosure

Application: Application Form 1, Form 2C (Outfall 001) and Form 2F (Outfalls 001 and 002) for the Buckeye Caribbean Terminals LLC facility with NPDES Permit Number PR0000400, submitted under cover letter dated September 20, 2012 with revised application pages/documents (Attachment list and Attachments 1, 2, 4, 5, 6, 8, 9 and 10) submitted under June 19, 2013 cover letter

Please respond to the request for additional information below concerning the above referenced application form(s) and submit revised insert pages to provide the information required. Provide a clear explanation of which pages, attachments, etc. are being revised.

1. VII.C – The Form 2F, Item VII.C requires "CAS Number (if available)". For Outfall 001, provide updated pollutant names and CAS number as follows:

   a. Cresol - The original May 19, 2011 NPDES permit application provided the following CAS numbers for the combined Meta and Para isomers of cresol and left blank the Ortho isomer:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants	
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite			
	<0.2 µg/l	<0.2 µg/l Note 1			1.00	o cresol	(Note 2)
59 50 7	<0.2 µg/l	<0.2 µg/l Note 1			1.00	mp cresol	(Note 2)

   EPA's deficiency letter commented that the CAS numbers appear incorrect: m cresol isomer should be 108-39-4 instead of 59-50-7; p-cresol isomer should be 106-44-5 instead of 59-50-7.

   The revised September 20, 2012 application provided the following CAS numbers:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants	
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite			
95 48 7	<0.2 µg/l	<0.2 µg/l Note 1			1.00	o cresol	(Note 2)
59 50 7	<0.2 µg/l	<0.2 µg/l Note 1			1.00	mp cresol	(Note 2)

   EPA's letter then provided the following comment: A CAS # of 59-50-7 is reported for "mp cresol". This value corresponds to the chemical name m-cresol. Also, EPA could not find either "m-cresol" or "mp cresol" in Form 2F, Table 2F-2, 2F-3 or 2F-4. The name "mp cresol" must be revised to show the same name and spelling as shown in the applicable Form 2F, Table 2F-2, 2F-3 or 2F-4.

The revised application insert page under May 19, 2013 letter provided the following CAS numbers which has removed the sampling for p-cresol:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
95-48-7	<0.2 ug/l	<0.2 ug/l Note 1			1.00	o cresol (Note 2)
108-39-4	<0.2 ug/l	<0.2 ug/l Note 1			1.00	m cresol (Note 2)

The name "cresol" is shown in Table F-3 of the application instructions not the three individual isomers. EPA understands that there is no method to analyze for the three isomers "as one". They are usually analyzed and reported as the Ortho isomer and the Meta/Para isomer pair.

According to the instructions if you know or have reason to believe that cresol is discharged in concentration of 10 ppb or greater then you must submit quantitative data for this parameter in Item V, Part C. Since analytical data cannot be provided for the isomers of cresol "as one" then you should provide quantitative data for the individual o-cresol isomer and the mp-cresol isomer pair. EPA notes that the May 19, 2011 application did provide the names correctly but that application has been superseded. The CAS number for the mp-cresol isomer pair can be left blank since there is no available CAS number for this pair.

b. Cyanide, Total - The original May 19, 2011 NPDES permit application left the CAS number blank for cyanide:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
	0.012 mg/l	0.010 mg/l			1.00	cyanide (Note 2)

EPA did not comment on leaving this CAS number blank. However, the revised September 20, 2012 application provided the following CAS number:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
74 90 8	0.012 mg/l	0.010 mg/l			1.00	cyanide (Note 2)

EPA's letter provided the following comment: A CAS # of 74-90-8 is reported for "cyanide". This value corresponds to the chemical name hydrogen cyanide;

The revised application insert page under May 19, 2013 letter has kept the same CAS number but changed the pollutant name from "cyanide" to "hydrogen cyanide":

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
74-90-8	0.012 mg/l	0.010 mg/lNote1			1.00	hydrogen cyanide (Note 2)

The instructions require reporting for "cyanide, total" since it is shown in Table F-3 of the application instructions not "hydrogen cyanide". The pollutant name must be changed back to "cyanide" or preferably "cyanide, total". Also, there is no CAS number for "cyanide, total" but there is for the cyanide (CN) ion, which is what comprises the Total CN result: 57-12-5. The application (and laboratory) should use this CAS number when reporting.

c. Xylene - The original May 19, 2011 NPDES permit application left blank the CAS numbers for the Meta and Para isomer pair for xylene and for the Ortho isomer:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
		<0.5 µg/l Note 1			1.00	mp xylene (Note 2)
		<0.2 µg/l Note1			1.00	o xylene (Note 2)

EPA did not comment on leaving these CAS numbers blank. However, the revised September 20, 2012 application provided the following CAS numbers:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
108 38 3	<0.5 µg/l	<0.5 µg/l Note 1			1.00	mp xylene (Note 2)
95 47 6	<0.2 µg/l	<0.2 µg/l Note 1			1.00	o xylene (Note 2)

EPA's letter then provided the following comment: A CAS number of 108-38-3 is reported for "mp xylene". This value corresponds to the chemical name m-xylene. Also, EPA could not find either "m-xylene" or "mp xylene" in Form 2F, Table 2F-2, 2F-3 or 2F-4. The name "mp xylene" must be revised to show the same name and spelling as shown in the applicable Form 2F, Table 2F-2, 2F-3 or 2F-4.

The revised application insert page under May 19, 2013 letter provided the following CAS numbers and has removed the results for p-xylene:

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
108-38-3	<0.5 ug/l	<0.5 ug/l Note 1			1.00	m-Xylenes (Note 2)
95-47-6	<0.2 ug/l	<0.2 ug/l Note 1			1.00	o-Xylenes (Note 2)

The name "xylene" is shown in Table F-3 of the application instructions not the three individual isomers. EPA understands that there is no method to analyze for the three isomers "as one". They are usually analyzed and reported as the Ortho isomer and the Meta/Para isomer pair.

According to the instructions if you know or have reason to believe that xylene is discharged in concentration of 10 ppb or greater then you must submit quantitative data for this parameter in Item V, Part C. Since analytical data cannot be provided for the isomers of xylene "as one" then you should provide quantitative data for the individual o-xylene isomer and the mp-xylene isomer pair. EPA notes that the May 19, 2011 application did provide the names correctly. The CAS number for the mp-xylene isomer pair can be left blank since there is no available CAS number for this pair.

2. Item X - Certification - When re-submitting the revised application insert pages, the certification must be re-signed, dated and re-submitted.